

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF OKLAHOMA**

**UNITED STATES OF AMERICA,**

**Plaintiff,**

**Case No. 22-CR-00348-GKF**

**v.**

**NAVIN KHANNA, a/k/a “Lovin,”  
a/k/a “Logan,”  
ADAM G. SHARKEY,  
ROBERT GARY SHARKEY,  
BENJAMIN ROBERT MANSOUR,  
TYLER JAMES CURTIS, a/k/a “Ty,”  
REISS NICOLE BIBY,  
MARTYNAS MACERAUSKAS, a/k/a  
“Marty,”  
KRISTINA McKAY MACERAUSKAS,  
PARKER STAR WEAVER,  
SHANE ALLEN MINNICK,  
RYAN DAVID LARUE,  
BRIAN PATE THOMAS,  
MICHAEL ANTHONY RHODEN,  
a/k/a “Big Mike,”**

**Defendants.**

**Unopposed Motion to Declare this Case  
a Complex Matter and Extend Deadlines**

The government requests that this Court find that this case is complex under the provisions of the Speedy Trial Act, 18 U.S.C. § 3161(h)(7)(B)(ii), and in support thereof, states as follows:

1) The United States advises the Court that the undersigned Assistant United States Attorney consulted with counsels for Defendants Mansour, Curtis, Biby,

M. Macerauskas, K. Macerauskas, Weavel, Minnick, Larue, Thomas, and Rhoden, regarding their position in reference to this motion and each has no objection.

2) Defendants Khanna, A. Sharkey, and R. Sharkey are in custody in another state and have not yet appeared in the Northern District of Oklahoma.

3) The Indictment in this case alleges a conspiracy related to stolen property and money laundering set forth in 40 counts and one forfeiture allegation against 13 defendants. Motions in this case are due December 12, 2022 and Jury Trial is set for January 17, 2023.

4) Discovery has not yet been produced by the government. The government will be filing a motion for a protective order shortly.

5) This discovery which consists of nearly two terabytes of data contains law enforcement reports, including arrest reports, surveillance reports, intercepted calls, body cam videos, tracker and ping data, Facebook downloads, phone downloads, photos from surveillance, and search warrants. The discovery also includes affidavits for wiretaps. There are hundreds of pertinent communications. There are over 300 law enforcement reports (pre-arrest). There are downloads from over 30 electronic devices/electronic accounts. There is tracker and ping data for approximately five vehicles/phones. There are also photos from surveillance and search warrants. There are audio/video recordings from controlled purchases and surveillance.

6) Given the volume of discovery to be turned over, the government requests that the trial date be continued for at least 120 days.

7) This case will require an extraordinary amount of time for each attorney to (1) review, digest, and evaluate the discovery that will be provided in this case, (2) consult with their clients; and (3) investigate the information.

8) This request for a continuance is made pursuant to 18 U.S.C. § 3161(h) which provides that certain “periods of delay shall be excluded in computing the time within which . . . the trial of any such offense must commence.” Among those periods of delay excluded are periods “resulting from a continuance granted by the judge . . . if the judge granted such continuance on the basis of his findings that the ends of justice served by taking such action outweigh the best interests of the public and the defendant in speedy trial.” 18 U.S.C. § 3161(h)(7)(A).

9) Among the factors which a judge shall consider in making this determination are “[w]hether the case is . . . so complex, due to the number of defendants, the nature of the prosecution, . . . that it is unreasonable to expect adequate preparation for pretrial proceedings or for the trial itself within the time limits established by this section.” 18 U.S.C. § 3161(h)(7)(B)(ii).

WHEREFORE, the United States respectfully requests that a new Scheduling Order be entered extending all dates for at least 120 days.

Respectfully Submitted,

CLINTON J. JOHNSON  
UNITED STATES ATTORNEY

/s/ David A. Nasar

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### Certificate of Service

I hereby certify that on the 28th day of November 2022, I electronically submitted the foregoing document to the Clerk of Court using the ECF System for filing and transmittal of a Notice of Electronic Filing to the following ECF registrant:

Clint James  
*Attorney for Benjamin Robert Mansour*

Randy Lynn  
*Attorney for Tyler James Curtis*

Gary James  
*Attorney for Reiss Nicole Biby*

Kevin Adams  
*Attorney for Martynas Macerauskas and Kristina Mckay Macerauskas*

William Lunn  
*Attorney for Parker Star Weavel*

Tracy Tiernan  
*Attorney for Shane Allen Minnick*

Craig Hoehns  
*Attorney for Ryan David Larue*

William Widell / Sarah McManes  
*Attorneys for Brian Pate Thomas*

Andrew Casey  
*Attorney for Michael Anthony Rhoden*

/s/ David A. Nasar

David A. Nasar  
Assistant United States Attorney